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10 Attorneys for Four Seasons Hotels Limited, a Canadian company

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA

13 BENIGNO BACOLORES, on behalf of
14 himself and all others similarly situated,

15 Plaintiff,

16 v.

17 FOUR SEASONS HOTELS LIMITED, a
18 Canadian company doing business in
19 California, and Does 1-100, inclusive,

20 Defendant.

CASE NO. C-07-05592 MHP

(San Francisco Superior Court Case No. CGC-07-467485)

**DECLARATION OF SAMANTHA
WALDER IN SUPPORT OF DEFENDANT
FOUR SEASONS HOTELS LIMITED'S
MOTION TO TRANSFER VENUE TO
THE CENTRAL DISTRICT OF
CALIFORNIA
[28 U.S.C. §1404(a)]**

**ACCOMPANYING PLEADINGS:
NOTICE OF MOTION; SUPPORTING
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
PETER B. MARETZ**

Date: January 7, 2008

Time: 2:00 p.m.

Courtroom: 15

Judge: Marilyn Hall Patel

Class Action Fairness Act

Action Filed September 21, 2007

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1 I, SAMANTHA WALDER, declare:

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3 1. I am the Director of Human Resources of the Four Seasons Hotel Los Angeles at
4 Beverly Hills (hereafter "the Hotel") and I am employed by FS Hotels (L.A.) Inc. ("FS
5 Hotels"). The following is stated of my own knowledge or on my review of the records of FS
6 Hotels, which records I regularly rely upon and are kept in the ordinary course of business. If
7 called upon and sworn to testify, I could and would competently testify thereto. I make this
8 declaration in support of Defendant Four Seasons Limited's Motion to Transfer Venue to the
9 Central District of California

10 2. Benigno Bacolores was hired at the Hotel on April 3, 1987, and worked there until
11 he voluntarily terminated on June 22, 2007. Bacolores was never an employee of For Seasons.
12 Rather, Bacolores was employed exclusively by FS Hotels (L.A.) Inc., a California corporation
13 ("FS Hotels").

14 3. Mr. Bacolores worked the entire time in various capacities in the kitchen. Based on
15 the information provided to FS Hotels by Mr. Bacolores, I am informed and believe that
16 throughout his tenure with FS Hotels, Mr. Bacolores lived in or around the Los Angeles area.

17 4. At all times pertinent to this litigation, FS Hotels has been the employer of all of
18 the employees working at the Hotel. Moreover, FS Hotels does not employ anyone other than
19 those people working at the Hotel.

20 5. As the Director of Human Resources at the Hotel, I live and work in Los Angeles
21 County.

22 6. Elena Pikor is the Director of Finance at the Hotel. Ms. Pikor is employed by FS
23 Hotels and lives and works in Los Angeles County.

24 7. Ashley James is the Executive Chef at the Hotel. Chef James is employed by FS
25 Hotels and lives and works in Los Angeles County.

26 8. All of the current managers, supervisors, and line employees at the Hotel are
27 employed by FS Hotels. They all work in Los Angeles County and virtually all of them live in
28 Los Angeles County.

6 11. Older records are kept at off-site storage, but this would be in Los Angeles as well.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct. Executed this 9th day of November 2007, at Beverly Hills,
12 California.

Samantha Walder
Samantha Walder